

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

<b>FERMIN CORTEZ, <i>et al.</i>,</b>	)	<b>8:08CV90</b>
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>and</b>	)	
	)	<b>8:08CV99</b>
<b>DAVID CHUOL, <i>et al.</i>,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>STIPULATED MOTION REGARDING</b>
	)	<b>DISCOVERY DEADLINES</b>
<b>vs.</b>	)	
	)	
<b>NEBRASKA BEEF, LTD. and</b>	)	
<b>NEBRASKA BEEF, INC.,</b>	)	
	)	
<b>Defendants.</b>	)	

This 22<sup>nd</sup> day of February 22, 2010, the parties hereby jointly move the Court to enter an Order based upon their stipulation to the following:

1. The Court's Second Amended Order Setting Final Schedule for Progression of Case dated November 25, 2009 states that "[a]ll depositions, whether or not they are intended to be used at trial, shall be completed by March 1, 2010."
2. The parties have met and conferred and respectfully jointly request that the deadline to complete depositions that have already been noticed or requested be extended to April 9, 2010.
3. In addition, the parties have met and conferred and agreed that Plaintiffs' responses and objections to Defendants' written discovery requests shall be due by March 19, 2010.

4. This joint motion is made in good faith, and not for the purpose of delay, and will not affect the remainder of the Court's Order dated November 25, 2009, or the trial date scheduled for June 21, 2010.

Respectfully submitted,

Date: February 22, 2010

s/ Shanon J. Carson  
Shanon J. Carson  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia, PA 19103

ATTORNEYS FOR PLAINTIFFS

AND

Date: February 22, 2010

NEBRASKA BEEF, INC., and NEBRASKA BEEF, LTD.,  
Defendants,

By: s/ William R. Settles  
William M. Lamson, Jr., #12374  
William R. Settles, #19879  
Brian J. Brislen, #22226  
LAMSON, DUGAN and MURRAY, LLP  
10306 Regency Parkway Drive  
Omaha, NE 68114-3743  
Telephone: (402) 397-7300  
Telefax: (402) 397-7824  
[wml@ldmlaw.com](mailto:wml@ldmlaw.com)  
[wrs@ldmlaw.com](mailto:wrs@ldmlaw.com)  
[bjb@ldmlaw.com](mailto:bjb@ldmlaw.com)

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2010, I electronically filed the above document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Brian J. Brislen	bbrislen@ldmlaw.com, rebeccal@ldmlaw.com
Shanon J. Carson	scarson@bm.net
Carolyn H. Cottrell	ccottrell@schneiderwallace.com, efilings@schneiderwallace.com, evancampen@schneiderwallace.com
Philip A. Downey	downeyjustice@gmail.com
Michael Hamilton	mhamilton@provostumphrey.com, lheembrock@provostumphrey.com
William M. Lamson, Jr.	wlamson@ldmlaw.com, amyk@ldmlaw.com
Brian P. McCafferty	cafstar@aol.com
Todd M. Schneider	tschneider@schneiderwallace.com, efilings@schneiderwallace.com
William R. Settles	wrs@ldmlaw.com, jray@ldmlaw.com
Christopher P. Welsh	cwelsh@welsh-law.com
James R. Welsh	jwelsh@welsh-law.com
W. Hank Willson, IV	wwillson@schneiderwallace.com, efilings@schneiderwallace.com

Date: February 22, 2010

s/ Shanon J. Carson  
Shanon J. Carson  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia, PA 19103

*Attorney for Plaintiffs*